

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

IN RE: HIGH-TECH EMPLOYEE
ANTITRUST LITIGATION

Master Docket No. 11-CV-2509-LHK

THIS DOCUMENT RELATES TO:
ALL ACTIONS

**[PROPOSED] FINAL JUDGMENT AND
DISMISSAL**

The Court hereby enters final judgment in this action as between Plaintiffs and the Class and Defendants Adobe Systems, Incorporated, Apple Inc., Google Inc., and Intel Corporation (“Defendants”), as defined in Federal Rule of Civil Procedure 58(a). Pursuant to this Final Judgment:

1. All Released Claims of Plaintiffs and the Class are hereby released as against Defendants and all other Released Parties as defined in the Settlement.
2. The Court finds that the Class Members who have exercised their right to exclude themselves from this Action, by submitting timely requests for exclusion pursuant to the notice mailed to the Class, are not included in or bound by this order and final judgment. The excluded Class Members are listed in Exhibit A.

1 3. Without affecting the finality of the Court's judgment in any way, the Court
2 retains jurisdiction over this matter for purposes of resolving issues relating to the interpretation,
3 administration, implementation, effectuation, and enforcement of the Settlement.

4 4. The parties and the Notice Administrator are hereby ordered to comply with the
5 terms of the Settlement.

6 5. This action is dismissed with prejudice as against the Defendants, each side to bear
7 its own costs and attorneys' fees except as provided by the Settlement and the Court's orders.

8 6. This document constitutes a final judgment and separate document for purposes of
9 Federal Rule of Civil Procedure 58(a).

10 7. The Court finds, pursuant to Rules 54(a) and (b) of the Federal Rules of Civil
11 Procedure, that this Final Judgment should be entered and that there is no just reason for delay in
12 the entry of this Final Judgment as to Plaintiffs and the Class and Defendants. Accordingly, the
13 Clerk is hereby directed to enter Judgment forthwith.

14
15 Dated: July __, 2015

16 LUCY H. KOH
17 United States District Judge
18
19
20
21
22
23
24
25
26
27
28